

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Nelson Omar Carrion-Tirado, Sr. : Chapter 13  
Yvonne H. Carrion, :  
Debtors : Bankruptcy No. 15-13642-ref

**MOTION TO CONVERT CHAPTER 13 CASE TO A CHAPTER 7**

Nelson Omar Carrion-Tirado, Sr. and Yvonne H. Carrion, Debtors, by and through their counsel, Brenna H. Mendelsohn, Esquire, of Mendelsohn & Mendelsohn, P.C. files this Motion to Convert debtor's instant Chapter 13 Bankruptcy to a Chapter 7 Bankruptcy and in support thereof, represents the following:

1. The debtors, Nelson Omar Carrion-Tirado, Sr. and Yvonne H. Carrion, filed a Petition for relief under 11 U.S.C. Chapter 13 of the Federal Code on May 22, 2015 case number 15-13642-ref and this case is still pending before this Honorable Court.
2. The debtors seek an Order allowing his case to be converted from a Chapter 13 to a Chapter 7 Bankruptcy.
3. The debtors no longer have the monthly disposable income to feasibly remain in a Chapter 13 Plan.

**WHEREFORE**, the debtors pray that this Honorable Court enter an Order allowing Debtors to convert their Chapter 13 case to a Chapter 7 case as it is the more appropriate form of relief under the circumstances.

Respectfully Submitted,

/s/ Brenna H. Mendelsohn  
Brenna H. Mendelsohn, Esquire  
Attorney for Debtors

Dated: December 11, 2017